An aerial photograph of a city skyline at sunset. The sky is filled with soft, golden clouds. In the foreground, there is a dense area of green trees and a multi-lane highway with a curved overpass. The city skyline in the background features several prominent skyscrapers, including a tall, dark, rectangular building with a grid-like facade and a pointed-top building. The overall scene is bathed in the warm, golden light of the setting sun.

Modern Slavery Statement

Land Services WA Holdings Pty Ltd as trustee for the Land Services
WA Holdings Trust (Land Services WA)
1 July 2024 to 30 June 2025

1. ABOUT OUR MODERN SLAVERY STATEMENT

Our Modern Slavery Statement for the Financial Year 2024-25 was prepared under the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**). This Statement sets out our actions to assess and minimise risks of Modern Slavery in our operations and supply chains.

Land Services WA Holdings Pty Ltd (ACN 635 079 873) as trustee for the Land Services WA Holdings Trust (ABN 90 684 886 625) (**Land Services WA** or **LSWA**), is a private Australian-domiciled trust, in its own right and on behalf of its controlled entities. Our statement is a joint statement on behalf of Land Services WA for entities which are reporting entities under the Modern Slavery Act and other controlled entities which are not reporting entities under the Modern Slavery Act but are included for transparency purposes (together the **LSWA Group**). Appendix 1 to this Statement sets out the location in this Statement of the mandatory disclosure topics required by section 16 of the Modern Slavery Act. Appendix 2 to this Statement contains a list of the LSWA reporting entities and other controlled entities that do not meet the threshold for reporting entities under the Modern Slavery Act.

Unless explicitly provided otherwise, the information in this Statement provides a consolidated depiction of the LSWA Group's actions. This Statement applies for the following Reporting Period of 1 July 2024 to 30 June 2025 (the **Reporting Period**). Unless stated otherwise, all figures are for the financial year ending 30 June 2025.

Prior to Board approval, this Statement was reviewed and endorsed by the LSWA Chief Executive and Company Secretary. Consultation with controlled entities is set out in section 7. This Statement will be reviewed and updated annually or more frequently if needed to meet regulatory requirements.

This Statement for the financial year ending 30 June 2025 was approved by the Board of Land Services WA Holdings Pty Ltd (ACN 635 079 873) as trustee for the Land Services WA Holdings Trust (ABN 90 684 886 625) on 22 October 2025, which is acting as a higher entity under section 14(2)(d)(ii) of the Modern Slavery Act, approved the Statement for other LSWA Group entities. The Board has delegated authority to the Chairperson and Chief Executive Officer to sign and submit this Statement for and on behalf of the LSWA Group.



Christopher Mark Butcher
Chairperson



Eugene Suares
Chief Executive Officer

Dated: 3 November 2025

2. INTRODUCTION

Purpose

Land Services WA was appointed in October 2019 as the Service Provider to Landgate, the Western Australian Land Information Authority to provide, improve and maintain the systems that facilitate Landgate's automated titling services, including document and plan processing, searches and associated products and services.

Our exclusive concession operates for a 40-year term with Landgate and the State of Western Australia. At our core, Land Services WA is a technology solution provider, working collaboratively with the State of Western Australia as well as clients and partners. We are committed to delivering products and services that support growth, efficiency, and risk management imperatives. In conjunction with Landgate and the State of Western Australia, Land Services WA can leverage access to land and property data to develop product or service solutions for the community. This has culminated in several approved products.

Since inception we have grown into a trusted partner for Landgate and the State, delivering high value, reliable services, while transforming and moving our services into the digital environment. We have also invested for improved customer outcomes and enhanced security of the register.

All of this helps us work towards our vision of delivering highly valued and trusted services to the community and being recognised for the creation of innovative solutions. Backed by our values of **One Team, Respect, Integrity, Innovation, and Excellence**, we make this Statement by continuing to improve our management of Modern Slavery risks and complying with our regulatory obligations under the Modern Slavery Act. LSWA is committed to the prevention of all forms of Modern Slavery including servitude, forced and compulsory labour and human trafficking in our business and supply chains. LSWA supports the goals of the Modern Slavery Act and prides itself on acting ethically and responsibly, and we expect our people and suppliers to share our commitment to ensuring Modern Slavery practices do not exist in any area of our business and supply chain. LSWA acknowledges that freedom from slavery is a fundamental human right. LSWA also recognises that slavery can take many forms. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation (collectively **Modern Slavery**). Below is the summary of the eight types of serious exploitation that LSWA provided its employees in its 2025 Modern Slavery Training.

Human Trafficking

- Physical movement of people across or within borders through coercion, threat or deception with the purpose of exploiting them when they reach their destination.

Slavery

- Situations where people are owned by others.

Servitude

- When a person does not consider themselves free to leave or stop working because of coercion, threat or deception.

Forced Labour

- When a person is not free to stop working or leave their place of work

Debt Bondage

- When a person works to repay a real or perceived excessive debt that they may never be able to pay off.

Deceptive Recruitment

- When a person is deceived about their work and their work involves exploitation through a type of modern slavery.

Forced Marriage

- When a person has been forced to marry without giving their full and free consent.

Worst Forms of Child Labour

- The worst forms of child labour, is when a child is working under threat of penalty, menace or significant harm

The purpose of this Statement is to outline the policies, standards, processes, and approach of the LSWA Group in minimising and protecting against the risk of Modern Slavery within our business operations and supply chains.

We are committed to continually improving our reporting under the Modern Slavery Act and strengthening our approach to identifying, managing, and mitigating Modern Slavery Risks. In 2024–25, we took proactive steps to build on our previous commitments by enhancing employee training, making it mandatory for all new starters and requiring all employees to complete the training at least once annually. We also conducted a more thorough review of our supply chain by undertaking additional targeted supplier questionnaires and now requiring all vendors operating in high-risk countries to complete a Modern Slavery questionnaire as a compulsory part of our due diligence process.

3. OUR STRUCTURE, OUR OPERATIONS AND OUR SUPPLY CHAIN

Our Structure

LSWA is a privately owned entity and the LSWA Group comprises a number of entities, these are listed in Appendix 2.

The ultimate owners of Land Services WA are institutional investors who either directly or indirectly through wholly owned subsidiaries own shares and units in Land Services WA. The institutional investors are:

- Australian Retirement Trust, one of Australia’s largest superannuation funds formed through the merger of Sunsuper and Qsuper with 2.3 million members and are an industry superannuation fund. Further information about Australian Retirement Trust is available at: www.australianretirementtrust.com.au.
- Macquarie Group Limited is a global financial services group operating in 34 markets and listed on the Australian Securities Exchange (ASX: MQG). Macquarie Group, through its subsidiary, Macquarie Asset Management has invested into Land Services WA. Further information about Macquarie Group Limited is available at: www.macquarie.com.
- PSP Investments are one of Canada’s largest pension investment managers for members of the public sector pension plans of the federal public service, the Canadian Forces, the Royal Canadian Mounted Police and the Canadian Reserve Force. Further information about PSP Investments is available at: www.investpsp.com/en.
- HESTA are a specialist industry superannuation fund with deep connections to health and community services, having earned some of the super industry’s highest accolades. Further information about HESTA is available at: www.hesta.com.au/members

The wholly-owned entities within the LSWA Group are within the control of the LSWA Group and the LSWA Group is a closely held group with a common Board of Directors and officers appointed to Land Services WA. Each controlled entity within the LSWA Group operates under the direction and governance of LSWA and all share the same executive management team. All LSWA entities are governed by the parent company’s process and policies. The LSWA procurement policies and process apply across all LSWA entities, employees, contractors and third-parties engaged to act on behalf of LSWA. Additionally, LSWA’s Code of Conduct which applies across the LSWA Group specifically calls out zero tolerance towards Modern Slavery.

Our Operations

The LSWA Group primarily provides **Information Communication and Technology (ICT) Services**. These divisions are supported by an overall corporate division which includes Human Resources, Finance, Shared Services and Customer Services. Our team supports our core business which is to provide, improve and maintain the systems that facilitate Landgate’s automated titling services, including document and plan processing, searches and associated products and services.

Our main services include:

- provision of property data and information services; and

- ICT software development and support.

LSWA operates under the business names “Land Services WA”.

LSWA has four full-time employees, all of whom are employed to work in Perth out of our registered office located at Level 1, 3 Craig Street, Burswood WA 6100. LSWA’s business is predominately focussed on managing the key concession with Landgate and our trusted service providers that support us in our delivery of ICT services to Landgate. Our employees are largely management and finance professionals.



LSWA recognises that while our workforce is comparatively small, we are primarily an ICT business that operates in a typically male dominated environment. However, LSWA is working to ensure, as much as practicably possible, that we employ from a diverse background including gender, ethnic and culturally diverse backgrounds. We are proud that as at 30 June 2025 we have attained an equal gender split.

For more information on LSWA’s business, please refer to our website at: <https://www.landservices-wa.com.au/>.

Our Supply Chain

Given LSWA’s primary operations relate to the supply of ICT related services, our cost base is primarily comprised of people related costs and ICT expenses. LSWA is a moderate purchaser of goods and services required for our business ranging from single occasion purchases to longstanding contractual relationships. In the Reporting Period, the LSWA Group had a total annual spend of approximately **\$31,280,000** on goods and services procured from approximately **81** suppliers.

Our major suppliers are generally engaged on a fixed term basis typically ranging from project specific timeframes (e.g., 3-12 months) to longer master services agreements for 3 years or on an ongoing basis. While we predominantly use Australian suppliers, we also use global suppliers in six other countries. Regardless of location, the LSWA Group partners closely with our direct suppliers to understand and evaluate their supply chain practices, and we actively seek to engage with suppliers and other third parties who share similar values, ethics, and sustainable business practices.

During the Reporting Period vendors and suppliers located overseas comprised approximately **6.48%** of all third-party vendor spend. In the Reporting Period, LSWA expenditure on overseas suppliers represented an increase from the previous period of 2.5%.

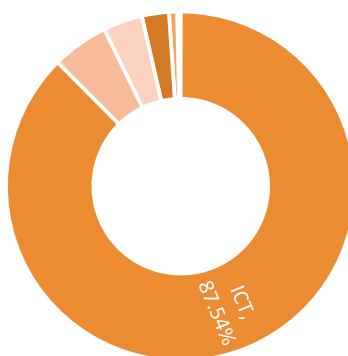
Country	Percentage of Spend	Estimated prevalence of Modern Slavery (per 1,000 population) ¹	Estimated number of people in Modern Slavery	Risk Rating ²
Australia	93.52%	1.6	41,000	Low
United States of America	4.61%	3.3	1,091,000	Medium
United Kingdom	1.74%	1.8	122,000	Low
Israel	0.08%	3.8	33,000	Medium
Canada	0.04%	1.8	69,000	Low
Ireland	0.01%	1.1	5,000	Low
New Zealand	0.01%	1.6	8,000	Low

Throughout the period, ICT expenditure again made up a significant proportion of all total expenditure, accounting for approximately 87.5% of total spend external suppliers. The next major categories of expenditure were employee related services (5.24%), and consultancy (3.63%). Employee services relate to select contractors, recruitment expenses, employee assistance programs, and staff training. We recognise that a large part of our ICT expenditure relates to the provision of services, and in some cases labour hire.

Categories	Percentage of total spend
ICT	87.54%
Employee	5.24%
Consultancy	3.63%
Operational	2.50%
Facilities	0.76%
Utilities	0.33%

Breakdown of spend across all supplier categories

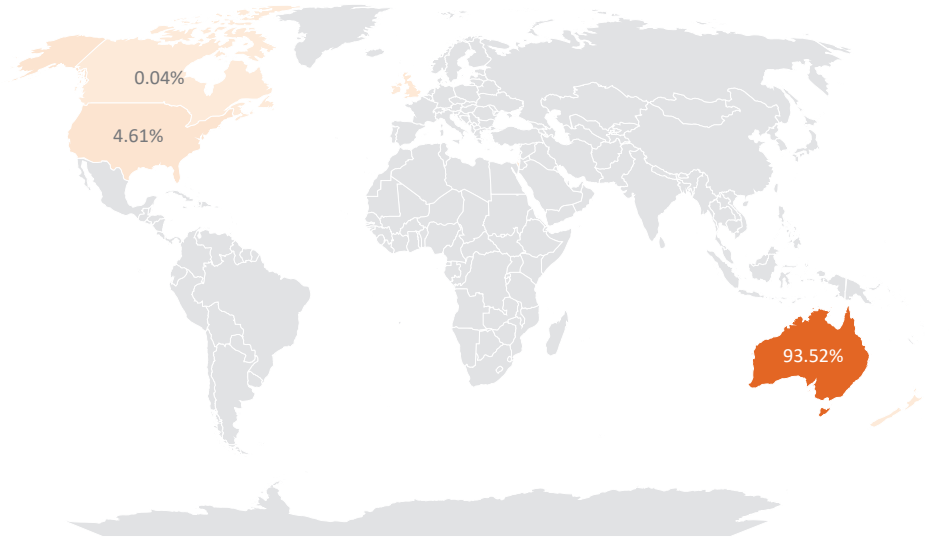
■ Consultancy ■ Employee ■ Facilities ■ ICT ■ Operational ■ Utilities



¹ Walk Free Foundation, The Global Slavery Index 2023, Appendix 2, Table 26.

² Based on the estimate prevalence of Modern Slavery (per 1,000 population) assessed as Low (less than 3 victims per 1,000 people); Medium (less than 7 but more than 3 victims per 1,000 people); and, High (greater than 7 victims per 1,000 people).

Global Percentage of supplier expenditure



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4. RISKS OF MODERN SLAVERY PRACTICES

LSWA understands that the nature and extent of Modern Slavery globally means that Australia is not immune from Modern Slavery and that there is a risk that it may be present in its operations and supply chains.³ The United Nations and Walk Free Foundation have estimated that there are approximately 50 million victims of Modern Slavery around the world.⁴ Preventing our own involvement in Modern Slavery forms part of our own commitment to operate a responsible and safe business and understanding the critical Western Australian economic infrastructure of which we are custodians.

Risk of Modern Slavery within Operations

VERY LOW

- Employee checks on right to work in Australia
- Modern slavery, bullying and harassment, and Code of Conduct training provided and mandatory for all employees
- Employee assistance and Whistleblower services provided to all employees

Risk of Modern Slavery within Supply Chains

LOW

- Most goods and services provided in Australia and low-risk countries
- Majority spend on ICT which is a higher-risk industry, but spend predominately in Australia
- Other higher-risk industries including catering and labor hire are almost all in Australia

³ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities - (8-12), available at URL: <https://www.homeaffairs.gov.au/criminaljustice/files/modern-slavery-reporting-entities.pdf>.

⁴ Ibid.

LSWA takes a risk-based approach to the managing the risk of Modern Slavery within our **operations** and our **supply chains**. This is largely based on the types of goods and services we procure as well as the geographic region.

Modern Slavery Risks in Our Operations

As at 30 June 2025, LSWA directly employs four people, all of which are full-time employees with all employed under individual employment contracts that meet or exceed the minimum legal entitlements in Australia. Given the small number of employees within our workforce is based in Perth and the nature of our business, this does not typically lend itself to a situation where there is a prevalence of Modern Slavery.

In this period, we implemented the Right to Disconnect, which saw our staff gain enhanced knowledge about their obligations during work and non-working hours.

Throughout the financial year, we have sought to strengthen our employee protections by engaging in an improved employee remuneration benchmarking and objective setting. This allows a more transparent approach to remuneration and performance.

We take the wellbeing of our employees seriously, with all employees having access to an Employee Assistance Program and a Whistleblower service. As part of our employee onboarding, we confirm that all employees have a right to legal work in Australia and confirm their visa or permanent residency.

At LSWA we continually aim to create a welcoming and inclusive environment. We have a number of policies, including our Flexible Work Policy, After Hours Policy, Work Health and Safety Policy and Employee Handbook collectively work to support our staff to feel empowered and to be their authentic selves to speak up. Our Workplace Discrimination, Harassment and Bullying Policy and Employee Grievance Policy address inappropriate workplace behaviour support employees affected by improper conduct.

All employees annually are required to complete a Code of Conduct sign-off which, as part of this highlights the risks of Modern Slavery. Our Code of Conduct was significantly enhanced over FY25 and sets the broad standards expected of all employees, one of which is to not engage in Modern Slavery. Our employees also undertook Modern Slavery training which highlighted what Modern Slavery is, risk factors that may lead to Modern Slavery, and how to escalate suspicions of Modern Slavery. In this period, we updated our Modern Slavery training to highlight real-life examples of Modern Slavery in Australia. Given this, the risks of Modern Slavery in our operations is, in our assessment, **very low**.

Modern Slavery Risks in Our Supply Chain

While the professional services sector is not typically associated with Modern Slavery practices, we are conscious that risks can also arise in certain industries connected to the professional services sector – in particular in the supply of goods and services in relation to:

- IT and electronic equipment where such goods may have been manufactured by another entity using minerals sourced or mined using forced labour; and
- labour hire.

As our operations are based and occur solely in Western Australia and considering the relevant sector and products and services risks to LSWA, we are at comparatively lower risk than other reporting entities within our industry. We recognise that the majority of our spend is limited to the supply of ICT labour hire support, technical ICT support and IT equipment. For our main supplier of ICT labour hire support, we conducted rigorous reviews including attendance at their offices. Further, their parent company has provided a copy of their Modern Slavery Statement and is in dialogue with LSWA regarding mitigating the risk of Modern Slavery in their supply chains. We assess the risk of Modern Slavery in our main suppliers' operations as very low.

However, beyond a few main suppliers, we recognise that we have undertaken limited due diligence on our other major suppliers with no to limited due diligence undertaken on our suppliers' suppliers.

We recognise that we have a supplier based in Israel and recognise with the ongoing conflict in Israel and Palestine that this could result in a greater risk of Modern Slavery. We have conducted a desktop review of this supplier,

including reviewing their ethical code of conduct, and believe that there is a limited risk of Modern Slavery in their operations. We have come to this conclusion as they provide technical ICT software and programs which is not typically subject to Modern Slavery. Further, we have conducted a desktop review of the prevalence of Modern Slavery in Israel and Palestine, and from our understanding this is typically limited to debt bondage, forced prostitution, or domestic servitude. It would, from our understanding, be uncommon for these types of practices to be instigated within the operations of a global ICT provider of highly technical software.

However, and while we predominantly use Australian suppliers, we recognise that several of our suppliers have global operations and therefore we must remain vigilant of the potential risk for the LSWA Group to be directly or indirectly linked to Modern Slavery practices. Accordingly, as assessed through the LSWA Group's risk management framework, LSWA Group's Modern Slavery risk in our supply chains has been assessed as a **low** risk.



5. OUR APPROACH TO TACKLING MODERN SLAVERY PRACTICES

We adopt a multi-layered approach to managing Modern Slavery risks within our business focussing on our corporate governance framework and our systems, processes, policies, and procedures. This includes group-wide policies, management/operating procedures, our enterprise risk appetite, and Risk Management Framework.

Corporate Governance Framework

Board	Executive	Employees
<p>The Board provides overall strategic direction and establishes the risk appetite for the LSWA through the Risk Committee. It also maintains oversight of the organisation's risk culture, supported by regular reporting from the Executive to both the Board and the Risk Committee.</p> <p>With respect to Modern Slavery, the Board's responsibilities include reviewing and monitoring risks identified by the Executive, overseeing the organisation's approach to managing those risks, and approving this Statement on an annual basis.</p>	<p>LSWA operates an enterprise risk management framework that provides a consistent methodology for identifying, analysing, evaluating, treating, monitoring, and reporting risks across all levels of the organisation. The Executive, led by the Chief Executive Officer, is responsible for:</p> <ul style="list-style-type: none"> • overseeing, reviewing, and enhancing the effectiveness of our approach to managing Modern Slavery risks within our operations and supply chain; and • ensuring that appropriate systems are in place to manage and mitigate these risks effectively. <p>Further details on the systems, processes, policies, and procedures we have implemented to operationalise these responsibilities are provided below.</p>	<p>Our Code of Conduct applies to all Employees and establishes the expectation that every person is treated with respect and dignity. It reinforces our commitment to comply with all applicable laws and to act ethically and with integrity, including a zero-tolerance approach to Modern Slavery practices. All Employees are required, both at onboarding and throughout their employment, to familiarise themselves with the Code of Conduct and the Whistleblower Protection Policy, and to complete training on the Code. Employees must annually reaffirm their commitment to the Code of Conduct and complete the associated training. In FY25, all staff undertook Code of Conduct training and Modern Slavery Training.</p> <p>Our Whistleblower Policy sets out our commitment to ensuring people are free to question things and raise anything they are concerned about, including practices of our suppliers, service providers or contractors.</p>

Our systems, processes, policies, and procedures

We have established policies relevant to identifying, assessing, and mitigating the risks of Modern Slavery practices in our business as listed below, including on the next page. Our policies ensures that we meet our ethical business objectives and comply with our legal obligations. These policies are approved in accordance with our internal Delegations of Authority Policy and apply to all the entities we own and control.

Our key systems, processes, policies, and procedures which currently relate to the control of Modern Slavery risks include:

- **Code of Conduct:** LSWA Code of Conduct reinforces LSWA's position on human rights and Modern Slavery. All employees are expected to abide by the spirit, as well as the strict requirements, of the Code of Conduct and applicable policies and procedures – employees are expected to ask not just “can we” but “should we”. Our Code of Conduct was significantly enhanced in FY25. Each year employees are required to confirm they have read and understood and confirm their commitment to the Code of Conduct (including, where appropriate, reporting non-compliances). This is also a mandatory component of new employee inductions. The Code of Conduct is reviewed at least annually.
- **General Policies:** We have implemented several policies to ensure we act ethically and with integrity and observe fundamental aspects of human rights in all our business and employee relationships. These include our Code of Conduct and our work, health and safety policies (including our Workplace Discrimination, Harassment and Bullying Policy, which encompasses diversity and inclusion).
- **Our template agreements:** Our material consultancy agreements have modern slavery clauses which align with accepted practice. These are reviewed annually for appropriateness having regard to any evolving Modern Slavery risks within our supply chain.
- **Pre-employment screening and employment terms:** LSWA operates in a highly regulated environment and has robust policies and procedures concerning employment screening (including work eligibility checks), employment conditions (including fair pay and hours) and appropriate workplace behaviour. For example, all employees undertake extensive pre-employment background checks as part of our recruitment process and work terms and conditions are clearly outlined in an employee's contract. Where appropriate, LSWA requires our suppliers to provide evidence pre-employment screening, adherence to employment conditions and background checks.
- **Safe workplace:** LSWA is committed to maintaining a safe workplace that values equal opportunity and is free from discrimination, harassment, and victimisation. LSWA is also committed to maintaining an environment in which staff feel comfortable raising issues or concerns, and do not experience detriment because for speaking up. In 2024, LSWA implemented the Right to Disconnect which included the internal publication and promotion of our Afterhours Disconnection Policy. The ability for staff to *Speak Up* is reinforced through various avenues for raising concerns including those embedded in our Code of Conduct and Whistleblower Protection Policy.
- **ESG Reporting:** LSWA participates in annual global ESG benchmarking to measure LSWA's performance across all material social, governance and environmental issues including aspects of Modern Slavery.
- **Modern Slavery Training:** In 2024, LSWA implemented a new Modern Slavery training designed specifically for LSWA. It is compulsory for all new employees to complete the Modern Slavery Training, and for all employees to undertake refresher training each year. In 2025, we updated our Modern Slavery Training to ensure that it remained relevant and current. The 2025 Modern Slavery Training was focussed on current examples of Modern Slavery in Australia to highlight the prevalence of Modern Slavery in Australia. We are proud that in the current reporting period, all employees completed this training. This training aimed to help ensure our people understood what Modern Slavery is, how to identify risks of Modern Slavery, and how to appropriately escalate suspicions of Modern Slavery.

LSWA recognises that continuous improvement is a key element of creating an effective compliance and risk management system. Accordingly, the above systems, processes, policies, and procedures will be continually reviewed to ensure they remain effective and appropriate to control Modern Slavery risks within LSWA's operations and supply chains. In this regard, see further at “*Modern Slavery risk management tasks undertaken in the Reporting Period*” and “*Looking Ahead*” for future activities planned for the next Reporting Period. In 2024, LSWA implemented our template Grievance Mechanism to address any Modern Slavery matter that arises within our operations or supply chains. We have reviewed our template Grievance Mechanism and are of the view that it is still fit for purpose. No issues were raised that required its use. Further details about the creation of our Grievance Mechanism are available in our 2023-24 Modern Slavery Statement.

Modern Slavery risk management tasks undertaken in the Reporting Period

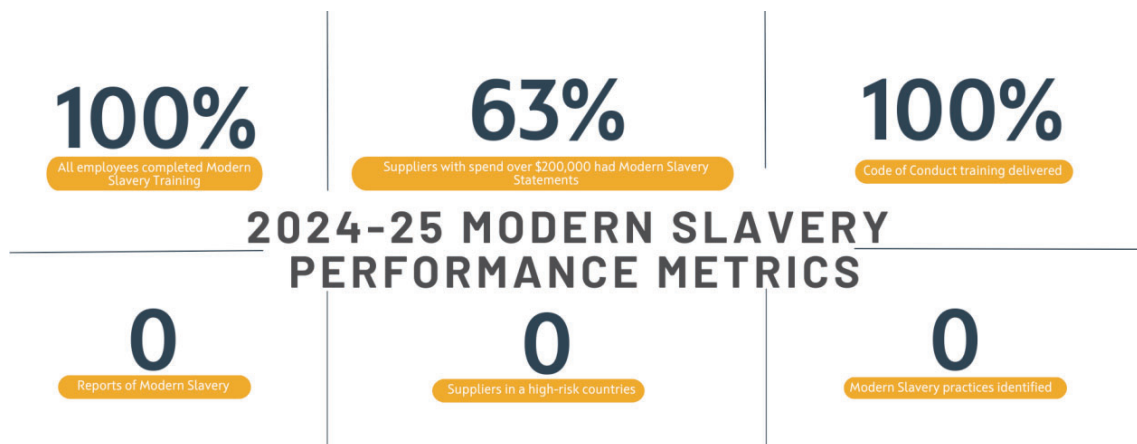
LSWA during the Reporting Period successfully met our committed tasks for 2024-25 and, in some cases, exceeded those tasks. These were in addition to Modern Slavery risks being considered as part of our enterprise risk management framework (including regular review of risks and controls and reporting to LSWA Risk Committee).



Assessing and reporting on effectiveness

During the reporting period LSWA has not identified any actual or potential cases of Modern Slavery practices within its operations and supply chains.

LSWA undertook a desktop review of 100% of key suppliers (i.e. where spend was over \$200,000 per annum), and we identified that during this period that over 63% of those suppliers had a Modern Slavery Statement. This demonstrates a significant proportion of our key suppliers are required by law, and are otherwise actively managing, Modern Slavery risks in their supply chain. LSWA will continue to evolve how we measure our effectiveness of mitigating Modern Slavery in our supply chains and operations. Even though LSWA increased training across the organisation, there were no reports of Modern Slavery across our organisation. LSWA will continue to report on the progress we have made and review the effectiveness of the measures we have put in place during the next (and subsequent) Reporting Periods. Ongoing reporting will form part of LSWA's standard reporting of enterprise risks to the LSWA's Board and Risk Committee.



Modern Slavery risk and the Ukraine and Middle East conflict

The global impacts of conflict and humanitarian crises, such as the war in Ukraine and the ongoing crisis in Israel and Palestine, have heightened the risks of Modern Slavery across global supply and value chains. Large-scale displacement, destruction and loss of livelihoods create conditions where vulnerable people are at greater risk of Modern Slavery, specifically trafficking, forced labour, and exploitative recruitment practices. While LSWA does not operate in or directly source from these regions, we recognise that global supply chain disruptions and sanctions may indirectly expose our supply chain to heightened Modern Slavery risks. However, we recognise that this risk, for LSWA remains low, but one that we need to be vigilant of.

We noted above that we have a supplier who is based in Israel and have assessed that this supplier is unlikely to directly be at a greater risk of Modern Slavery as a result of the Israel and Hamas conflict.

6. LOOKING AHEAD

Our Progress

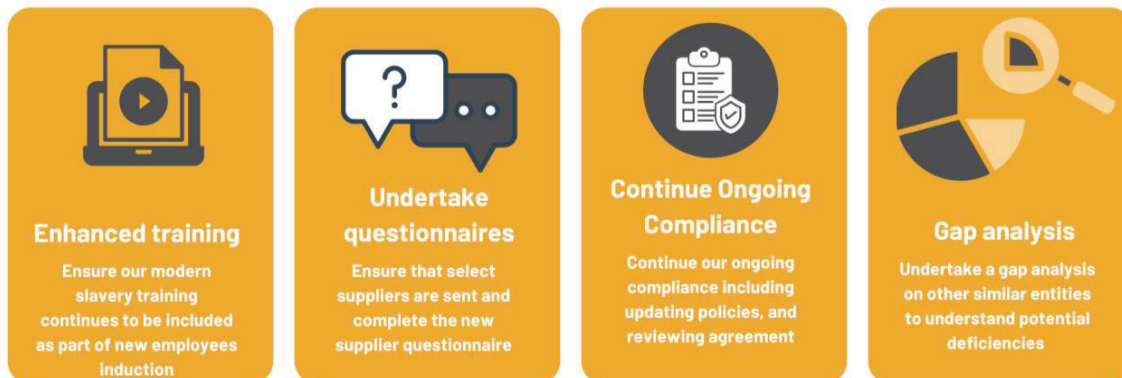
LSWA is committed to mitigating the risk of Modern Slavery in our operations and supply chains. We recognise that in 2024, there was a significant uplift in our approach to dealing with the risk of Modern Slavery in our operations and supply chains, this included compulsory staff training, Modern Slavery template grievance mechanism, and a supplier questionnaire. We are cognisant that in this period we focussed on solidifying our approach. Additionally, we look to continually review, update and enhance our policies and procedures. While we must look ahead, we must also recognise our achievements. In the 2023-24 Modern Slavery Statement, LSWA set ambitious tasks to further mitigate the risk of Modern Slavery in our operations and supply chains. We recognise that while we did create supplier questionnaires and they were used with some entities, more could have been achieved. This is an area for improvement in 2025-26. LSWA is pleased that it has successfully achieved the outcomes it set for itself in the 2024-25 Reporting Period.

Progress against 2024-25 goals



Our Future Commitments

LSWA recognises that we must continue to build on our previous achievements and look to continually mitigate the risk of Modern Slavery within our supply chains. However, we recognise that we are in a period of consolidation where we look to continue to embed our culture of compliance within the organisation and build awareness around the risks of Modern Slavery in our operations and supply chains. Broadly, our higher-level objectives are divided into more training, more supplier questionnaires and enhanced compliance. We discuss these in more detail in the table below.



Given our commitment to taking proactive steps to mitigate the risk of Modern Slavery within our supply chains and operations, we set the following goals.

Goal	Description	Status	Future Goal
Modern Slavery Training	Continue to ensure that the annual Modern Slavery training is included as part of all new employees' induction, and that annually all staff complete Modern Slavery Training.	Ongoing	For reporting in FY26 Reporting Period.

Goal	Description	Status	Future Goal
Questionnaires	Expand the use of Modern Slavery questionnaires to be mandatory for suppliers: <ul style="list-style-type: none"> in high-risk countries (if applicable); and where LSWA has an annual spend of over \$200,000 and who do not have a Modern Slavery statement. 	Ongoing	For reporting in FY26 Reporting Period.
Supplier Management	Continue to undertake desktop reviews of our suppliers (in high-risk categories) both current suppliers and when on-boarding. Ensure that the Key Supplier Management Policy is reviewed. Confirm that our contracts with key supplier address Modern Slavery.	Ongoing	For reporting in FY26 Reporting Period.
Template Supplier Agreements	Annual review of our template procurement and supplier agreements and where necessary enhance terms (including, where relevant from a risk perspective, requiring suppliers to maintain records in relation to their supply chains and provide any information relating to any developed supplier questionnaires so that we are assured that there are no Modern Slavery practices present in their business or supply chain).	Ongoing	For reporting in FY26 Reporting Period.
Policies and Procedures	Annual review of our policies and procedures (including enhancing where necessary), to enable our key people to identify, assess and mitigate the risks of Modern Slavery practices in our enterprise and supply chains. Ensure that policies and procedures are more standardised across the organisation.	Ongoing	For reporting in FY26 Reporting Period.
ESG Benchmarking	Continuing to participate in global ESG benchmarking, and work to increase our overall score, to measure performance across all material social issues including aspects of Modern Slavery.	Ongoing	For reporting in FY26 Reporting Period.
Modern Slavery Complaints	Monitor and respond to any complaints received by employees, customers, suppliers, contractors or third parties, including through the Whistleblower Protection Policy.	Ongoing	For reporting in FY26 Reporting Period.
Modern Slavery Training	Continue to ensure that the annual Modern Slavery training is included as part of all new employees' induction, and that annually all staff complete Modern Slavery Training.	Ongoing	For reporting in FY26 Reporting Period.

7. CONSULTATION WITH OTHER ENTITIES

Each of the entities that we own or control, were engaged in the development of this Statement through the following:

- The LSWA Group is a closely held group with a common Board of Directors and officers appointed to Land Services WA. Each controlled entity within the LSWA Group operates under the direction and governance of LSWA and all share the same executive management. Each LSWA Group entity has the same Company Secretary.
- LSWA has embedded extensive compliance and risk framework across its entire operations and operates as a single business unit. Modern Slavery risks, as with all enterprise risks, were discussed as part of our regular monthly LSWA Executive Risk Working Group.
- Each entity within the LSWA Group is covered by LSWA's policies, procedures, and systems, including those relating to contracting, purchasing and human resources.
- Our Board, Executive and senior leadership are aware of, and have directly participated in, those activities relevant to our Modern Slavery risk management efforts including our reporting obligations under the Modern Slavery Act.

Additionally, in preparing this Modern Slavery Statement, LSWA consulted across the LSWA Group through our legal function, as well as through our executive management and senior leaders who operate in a centralised process.

Each Director within the LSWA Group has reviewed this Modern Slavery Statement as part of our consultation process. Accordingly, all entities within the LSWA Group, including entities which are Reporting Entities, were engaged in the development of this statement, are aware of their obligations under the Modern Slavery Act and have been consulted as part of the preparation and submission of this Statement.



APPENDIX 1: MANDATORY REPORTING CRITERIA

This Statement was prepared to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act. The below table identifies where each criterion is addressed within the Statement.

Mandatory Criteria		LSWA Modern Slavery Statement	Page Reference
1.	Identify reporting entity.	About our Modern Slavery Statement Appendix 2	1 16
2.	Describe the reporting entity's structure, operations, and supply chains.	Introduction Our Structure, Our Operations and Our Supply Chains	2 to 3 3 to 6
3.	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of Modern Slavery Practices	6 to 9
4.	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Our Approach to tackling Modern Slavery Practices	9 to 13
5.	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address Modern Slavery risks.	Our approach to tackling Modern Slavery Practices Looking Ahead: Our Progress	9 to 12 12 to 15
6.	Describe the process of consultation with any entities the reporting entity owns or controls.	About our Modern Slavery Statement Consultation with other entities	1 16
7.	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Looking Ahead: Our future commitments	12 to 15

APPENDIX 2: LAND SERVICES ENTITIES

Reporting Entities:

Land Services WA Holdings Pty Ltd (ACN 635 079 873) as trustee for the Land Services WA Holdings Trust (ABN 90 684 886 625)

Land Services WA Operating Pty Ltd (ACN 635 080 232) as trustee for the Land Services WA Operating Trust (ABN 91 750 349 819)

Other Entities (Non-reporting):

Land Services WA Employee Pty Ltd ACN 635 080 581

Summer Finance Company Pty Ltd ACN 634 670 296